

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p><b>THE PEOPLE OF THE STATE OF COLORADO,</b></p> <p>v.</p> <p><b>JOSE RICARDO SARABIA-MARTINEZ, a/k/a Jose R. Martinez, Jose R. Sarabia, Jose Ricardo Sarabia, Jose Ricardo Martinez, Jose Sarabia- Martinez, Jose Martinez, Jose Sarabia, Ricardo Sarabia, Ricardo Martinez, Ricardo Sarabia-Martinez, Ricky Sarabia, and Efrain Rios,</b></p> <p><b>LAUREN MAES SARABIA, a/k/a Lauren Maes, Lauren Sarabia, Lauren Michelle Maes Sarabia, Lauren M. Maes, and Lauren M. Sarabia</b></p> <p><b>PEDRO SARABIA-MARTINEZ, a/k/a Pedro Sarabia and Pedro Martinez</b></p> <p><b>PABLO SARABIA-MARTINEZ, a/k/a Pablo Sarabia and Pablo Martinez</b></p> <p><b>RICARDO SARABIA-SALCIDO, a/k/a Ricardo Sarabia, Ricardo Salcido, Ricardo Sarabia-Saleido, Luis Adrian Torres Esquilin and Luis Torres</b></p> <p><b>and</b></p> <p><b>TERESA MARTINEZ, a/k/a Teresa de Jesus Sarabia, Teresa D Martinez De Sarabia, Teresa Martinez- DeSarabia, Teresa Martinez-DeSarabin and Teresa Lizarraga</b></p> <p>Defendants.</p>	
<p>JOHN W. SUTHERS, Attorney General ROBERT S. SHAPIRO, First Assistant Attorney General 1300 Broadway, 9<sup>th</sup> Floor Denver, CO 80203 720-508-6715 Registration Number: 26869</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> <p>Case No.: GJ Case No.: 14CR0001</p> <p>Ctrm: 259</p>
<p><b>COLORADO STATE GRAND JURY INDICTMENT</b></p>	

Of the 2014-2015 term of the Denver District Court in the year 2014; the 2014-2015 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

COUNT ONE	COCCA-Pattern of Racketeering- Participation in an Enterprise, §18-17-104(3), C.R.S. (F2) <b>37284</b>
COUNT TWO	COCCA-Conspiracy, §18-17-104(4), C.R.S. (F2) <b>37285</b>
COUNT THREE	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT FOUR	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT FIVE	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT SIX	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT SEVEN	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT EIGHT	Theft - \$20,000 or More, §18-4-401(1)(a),(2)(d), C.R.S. (F3) <b>0801V</b>
COUNT NINE	Theft - \$20,000 or More, §18-4-401(1)(b),(2)(d), C.R.S. (F3) <b>0801V</b>
COUNT TEN	Forgery, §18-5-102(1)(d), C.R.S. (F5) <b>1001D</b>
COUNT ELEVEN	Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) <b>25051</b>
COUNT TWELVE	Forgery, §18-5-102(1)(d), C.R.S. (F5) <b>1001D</b>
COUNT THIRTEEN	Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) <b>25051</b>
COUNT FOURTEEN	Forgery, §18-5-102(1)(d), C.R.S. (F5) <b>1001D</b>
COUNT FIFTEEN	Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) <b>25051</b>
COUNT SIXTEEN	Forgery, §18-5-102(1)(d), C.R.S. (F5) <b>1001D</b>
COUNT SEVENTEEN	Attempt to Influence a Public Servant, §18-8-306, C.R.S. (F4) <b>25051</b>
COUNT EIGHTEEN	Criminal Impersonation, §18-5-113, C.R.S. (F6) <b>1011A</b>
COUNT NINETEEN	Criminal Impersonation, §18-5-113, C.R.S. (F6) <b>1011A</b>
COUNT TWENTY	Theft - \$15,000 or More, §18-4-401(1)(b),(2)(d) C.R.S. (F3) <b>0801E</b>

COUNT TWENTY-ONE	Theft - \$15,000 or More, §18-4-401(1)(b),(2)(d) C.R.S. (F3) <b>0801E</b>
COUNT TWENTY-TWO	Theft - \$20,000 or More, §18-4-401(1)(b),(2)(d) C.R.S. (F3) <b>0801V</b>
COUNT TWENTY-THREE	Conspiracy to Commit Theft - \$15,000 or More §18-4-401(1)(b),(2)(d) and §18-2-201 C.R.S. (F4) <b>0801PC</b>
COUNT TWENTY-FOUR	Conspiracy to Commit Theft - \$20,000 or More §18-4-401(1)(b),(2)(d) and §18-2-201 C.R.S. (F4) <b>0801VC</b>
COUNT TWENTY-FIVE	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT TWENTY-SIX	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT TWENTY-SEVEN	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT TWENTY-EIGHT	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT TWENTY-NINE	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT THIRTY	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT THIRTY-ONE	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT THIRTY-TWO	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNTY THIRTY-THREE	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT THIRTY-FOUR	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT THIRTY-FIVE	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT THIRTY-SIX	Forgery, §18-5-102(1)(c), C.R.S. (F5) <b>1001C</b>
COUNT THIRTY-SEVEN	COCCA-Conspiracy, §18-17-104(4), C.R.S. (F2) <b>37285</b>

### **INDEX OF COUNTS**

<b>Defendant</b>	<b>Counts Applicable</b>
Jose Ricardo Sarabia-Martinez	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 15, 18, 20, 21, 22, 23, and 24
Lauren Maes Sarabia	1, 2, 14, 15, 16, 17, 20, 21, 22, 23, 24, 25, and 29
Pedro Sarabia-Martinez	20, 21, 23, 31, 34, and 37
Pablo Sarabia-Martinez	21, 23, 31, 32, 34, and 37
Ricardo Sarabia-Salcido	1, 2, 12, 13, 16, 17, 19, 20, 21, 23, 25, 26, 27, 28, 30, 33, 34, 35, and 36
Teresa Martinez	1, 2, 20, 21, and 23

## **COUNT ONE**

### **37284 VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT - PATTERN OF RACKETEERING - PARTICIPATION IN AN ENTERPRISE, C.R.S. §18-17-104(3) (F2)**

On or about September 21, 2001 through April 15, 2012, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of section 18-17-104(3), C.R.S.

## **COUNT TWO**

### **37285 VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT- CONSPIRACY, C.R.S. §18-17-104(4) (F2)**

On or about September 21, 2001 through April 15, 2012, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** and/or others to the Grand Jury and the Attorney General known or unknown, did unlawfully, knowingly, and feloniously conspire to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of sections 18-17-104(4) and 18-17-104(3), C.R.S.

The offenses alleged in Counts One, Two and Thirty-Seven were committed in the following manner:

### **The Enterprise**

The Enterprise alleged in Counts One, Two and Thirty-Seven is primarily a group of individuals, associated in fact, although not a legal entity, as well as a group of affiliated legal entities. More specifically the enterprise includes, but is not limited to, the following associated in fact individuals and/or legal entities:

**Jose Ricardo Sarabia-Martinez,  
Lauren Maes Sarabia,  
Pedro Sarabia-Martinez,  
Pablo Sarabia-Martinez,  
Ricardo Sarabia-Salcido,  
Teresa Martinez,  
Worldwide Mortgage, Inc,  
Worldwide Realty, Inc,  
Worldwide Investments Firm, Inc,  
Worldwide Property Management, LLC,  
Ideavision Marketing Corporation**

and other persons or entities known or unknown to the Grand Jury and the Attorney General.

The above cited members of the Enterprise collaborated with one or more of the others as principals and/or complicitors to use their status as professionals in the real estate industry or as related associates to execute a long-term diverse fraud for profit scheme. The scheme primarily centered on mortgage fraud including but not limited to the manipulation of multiple real estate transactions through the use of fraudulent statements, material omissions , acquiring false identification and notary commissions, as well using “straw buyers” to buy and sell real estate properties that ultimately resulted in arguably foreseeable foreclosures. When these straw buyers’ properties were foreclosed the Enterprise had already nonetheless been able to fraudulently acquire money through fees, commissions and by diverting the excess profit that was obtained from facilitating these fraudulent loans from the deceived lenders. The alleged behavior occurred in various jurisdictions, including, in the City and County of Denver, in Adams County and in Arapahoe County, all in the State of Colorado.

### **Pattern of Racketeering Activity**

**Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Pedro Sarabia-Martinez, Pablo Sarabia-Martinez, Ricardo Sarabia-Salcido and Teresa Martinez** and others known and unknown to the Grand Jury directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, related to the conduct of the enterprise, with at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Theft, C.R.S. §18-4-401;  
Conspiracy to Commit Theft, C.R.S. §§ 18-2-201 and 18-4-401;  
Forgery, C.R.S. §18-5-102;  
Attempt to Influence a Public Servant, §18-8-306;  
Criminal Impersonation, §18-5-113; and  
Bank Fraud, 18 U.S.C. §1344

Pursuant to C.R.S. § 18-17-103(5)(a), “Racketeering Activity” means and also includes any conduct defined as “racketeering activity” under 18 U.S.C. §1961 (1)(A), (1)(B), (1)(C) and (1)(d). As a result, the federal offense of Bank Fraud, 18 U.S.C. §1344, is an applicable offense which can serve as “racketeering activity” (Predicate Act) in support of Counts One and Two, as alleged in this State Indictment. Furthermore, the alleged Bank Fraud in this Indictment is directly related to the ongoing behavior of this Enterprise during the charged time period.

### **Racketeering Activity**

The acts of racketeering activity that the above named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses:

**PREDICATE ACT ONE**  
**(Statement of Personal History)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about July 12, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez**, with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Statement of Personal History; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT TWO**  
**(Personal Financial Statement)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about October 11, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez**, with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Personal Financial Statement; in violation of section 18-5-102(1)(c), C.R.S.



**PREDICATE ACT THREE**  
**(Verification of Loan x 3)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about November 24-29, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Verification of Loan documents re. the Location3 Media Inc./Andrew Beckman and Paul Gatchis Loans; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT FOUR**  
**(Statement of Personal History)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about December 6, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Statement of Personal History; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT FIVE**  
**(Borrower's Certification)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about December 15, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Borrower's Certification; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT SIX**  
**(Re. 403 16<sup>th</sup> Street, Suites 200 and 300, Denver, CO)**

**THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(a),(2)(d) (F3)**

On or about December 15, 2010, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan in the form of money belonging to Borrego Springs Bank, N.A. and/or the Small Business Administration, with the value of twenty thousand dollars or more, without authorization or by deception, and intended to deprive the Small Business Administration and/or Borrego Springs Bank, N.A., permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(d), C.R.S.

**PREDICATE ACT SEVEN**  
**(Re. 403 16<sup>th</sup> Street, Suites 200 and 300, Denver, CO)**

**THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about December 15, 2010, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan in the form of money belonging to Borrego Springs Bank, N.A. and/or the Small Business Administration, with the value of twenty thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Borrego Springs Bank, N.A. and/or the Small Business Administration of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT EIGHT**  
**(Re. 403 16<sup>th</sup> Street, Suites 200 and 300, Denver, CO)**

**BANK FRAUD, 18 U.S.C. § 1344**

On or about July 12, 2010 to and including December 15, 2010, in the District of Colorado, State of Colorado, **Jose Ricardo Sarabia-Martinez**, the defendant, unlawfully and knowingly executed or attempted to execute a scheme or artifice to defraud Borrego Springs Bank N.A., a financial institution, or to obtain any moneys, funds, credits, assets, securities, or other property from Borrego Springs Bank N.A., a financial institution, by means of false or fraudulent pretenses, representations, or promises; in violation of 18 U.S.C. § 1344.

The offenses alleged in Predicate Acts One through Eight were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

During the dates alleged in the above, Jose Ricardo Sarabia-Martinez was serving as an owner and operator of four (4) affiliated businesses located in the metropolitan Denver, CO area. These family businesses included Worldwide Investments Firm, Inc., Worldwide Property Management, LLC, Worldwide Realty, Inc. and Worldwide Mortgage, Inc.. In June 2006, Jose Ricardo Sarabia-Martinez and one of these businesses entered into a Commercial Lease Agreement with a landlord named Paul Gatchis to rent the top floors of a building located in the 400 block of 16<sup>th</sup> Street in the City and County of Denver, Colorado. This lease included an Option to Purchase the second and third floors of this commercial real estate from Mr. Gatchis for \$2.5 million with Mr. Gatchis, as the seller, prepared to finance \$2.0 million plus interest. This also included Mr. Sarabia-Martinez' business tendering a nonrefundable \$100,000.00 as an earnest money deposit. On or about May 11, 2007, the sale of this property between Mr. Gatchis and Mr. Sarabia-Martinez' business, Worldwide Property Management, LLC, was completed. This sale included a Promissory Note in the amount of \$2.0 million

being executed and held by Paul Gatchis along with other legal documents being executed.

In 2010, Mr. Gatchis, the lender, initiated a foreclosure action and a demand against Worldwide Property Management, LLC for this loan and account being past due. Later in 2010, the leadership of Worldwide Property Management, LLC, including but not limited to Jose Ricardo Sarabia-Martinez' significant other, Lauren Maes, filed a Notice of Intent to Cure Default. As of July 26, 2010, the amount of money owed to Mr. Gatchis by Worldwide Property Management, LLC that was causing the default was in excess of \$125,000.00. In addition to this amount, Mr. Sarabia-Martinez was delinquent for his personal income taxes owed to the State of Colorado. Contemporaneous to these delinquencies Mr. Sarabia-Martinez was looking for a solution to refinance the loan. Furthermore, at the same time the business and/or real estate taxes owed to the City and County of Denver for the 2007-2009 tax years were in the arrears in an amount in excess of \$175,000.00.

It appears that based on the above cited developments, beginning on or about July 12, 2010, Jose Ricardo Sarabia-Martinez started to work with the Small Business Administration and/or Borrego Springs Bank, N.A. to obtain a new loan to refinance the loan that he and his business had with Mr. Gatchis for the 403 16<sup>th</sup> Street, Suites 200 and 300, Denver, CO. As part of this process the Grand Jury obtained evidence showing that Jose Ricardo Sarabia-Martinez used deception when he falsely made, completed and/or uttered the following documents that were intentionally designed to defraud the Small Business Administration and/or Borrego Springs Bank, N.A, an FDIC insured financial institution in 2010:

Statement of Personal History, July 12, 2010;

Personal Financial Statement, October 11, 2010;

Verification of Loan, November 24, 2010 (Location3 Media Inc./Andrew Beckman re. a \$250,000.00 loan)

Verification of Loan, November 24, 2010 (Location3 Media Inc./Andrew Beckman re. a \$60,000.00 loan)

Verification of Loan, November 24, 2010 (Paul Gatchis re. a \$2,000,000.00 loan)

Statement of Personal History, December 6, 2010; and

Borrower's Certification, December 15, 2010.

As a result of the forgeries cited above and the evidence of false statements that were submitted or the material omissions that were not contained in the submitted documents the Grand Jury record indicates that Jose Ricardo Sarabia-Martinez deceived the named victims in a manner that he and his businesses were able to obtain or exercise control of a loan in the form of money in excess of \$2.3 million and had the purpose to permanently deprive the named victims of its use or benefit.

**PREDICATE ACT NINE**  
**(Rios Driver's License Application)**

**FORGERY, C.R.S. 18-5-102(1)(d) (F5)**

On or about May 21, 2003, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** with the intent to defraud the Colorado Department of Revenue - Motor Vehicles, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: a Colorado Driver's License Application, a public record or instrument filed, required by law to be filed or legally fileable in or with a public office or public servant: the Colorado Department of Revenue - Motor Vehicles; in violation of section 18-5-102(1)(d), C.R.S..

**PREDICATE ACT TEN**  
**(Rios Driver's License)**

**ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about May 21, 2003, and initially discovered on October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** unlawfully and feloniously attempted to influence M. Michael Cooke, Executive Director of the Colorado Department of Revenue and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S..

**PREDICATE ACT ELEVEN**  
**(Torres Esquilin Driver's License Application)**

**FORGERY, C.R.S. 18-5-102(1)(d) (F5)**

On or about September 21, 2001 to December 13, 2002, in the State of Colorado, **Ricardo Sarabia-Salcido** with the intent to defraud the Colorado Department of Revenue - Motor Vehicles, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: a Colorado Driver's License Application, a public record or instrument, filed, required by law to be filed or legally fileable in or with a public office or public servant: the Colorado Department of Revenue - Motor Vehicles; in violation of section 18-5-102(1)(d), C.R.S.

**PREDICATE ACT TWELVE**  
**(Torres Esquilin Driver's License)**

**ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about September 21, 2001 to December 13, 2002, and initially discovered on October 20, 2011, in the State of Colorado, **Ricardo Sarabia-Salcido** unlawfully and feloniously attempted to influence Fred Fisher, Executive Director of the Colorado Department of Revenue, and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

**PREDICATE ACT THIRTEEN**  
**(Rios Driver's License and Notary)**

**CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(e) (F6)**

On or about May 21, 2003 to September 5, 2003, and initially discovered on October 20, 2011, **Jose Ricardo Sarabia-Martinez** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, namely: Efrain Rios, and in such identity or capacity did an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(e), C.R.S.

**PREDICATE ACT FOURTEEN**  
**(Torres-Esquilin Driver's License and Notary)**

**CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(e) (F6)**

On or about September 21, 2001 to September 5, 2003, and initially discovered on October 20, 2011, **Ricardo Sarabia-Salcido** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, namely: Luis Adrian Torres Esquilin and/or Luis A. Torres, and in such identity or capacity did an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(e), C.R.S.

**PREDICATE ACT FIFTEEN**  
**(Rios Notary)**

**FORGERY, C.R.S. § 18-5-102(1)(d) (F5)**

On or about September 4-5, 2003, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia**, with the intent to defraud the Colorado Secretary of State, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a public record or an instrument, namely: a Notary Application, filed, required by law to be filed, or legally fileable in or with the Colorado Secretary of State, a public office or public servant; in violation of section 18-5-102(1)(d), C.R.S.

**PREDICATE ACT SIXTEEN**  
**(Rios Notary)**

**ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about September 4-5, 2003, and initially discovered on October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia** unlawfully and feloniously attempted to influence Donetta Davidson, Colorado Secretary of State, and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

**PREDICATE ACT SEVENTEEN**  
**(Torres Notary)**

**FORGERY, C.R.S. § 18-5-102(1)(d) (F5)**

On or about September 4-5, 2003, in the State of Colorado, **Ricardo Sarabia-Salcido and Lauren Maes Sarabia**, with the intent to defraud the Colorado Secretary of State, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a public record or an instrument, namely: a Notary Application, filed, required by law to be filed, or legally fileable in or with the Colorado Secretary of State, a public office or public servant; in violation of section 18-5-102(1)(d), C.R.S.

**PREDICATE ACT EIGHTEEN**  
**(Torres Notary)**

**ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)**

On or about September 4-5, 2003, and initially discovered on October 20, 2011, in the State of Colorado, **Ricardo Sarabia-Salcido and Lauren Maes Sarabia** unlawfully and feloniously attempted to influence Donetta Davidson, Colorado Secretary of State, and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

The offenses alleged in Predicate Acts Nine through Eighteen were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

During the time period cited in the above acts a set of Driver's Licenses were applied for and obtained by Jose Ricardo Sarabia-Martinez and his father, Ricardo Sarabia, a/k/a Ricardo Sarabia-Salcido, from the State of Colorado by and through the Department of Revenue-Motor Vehicles using other names and identities besides their legal names. In the case of Jose Ricardo Sarabia-Martinez, evidence was developed showing that on or about May 21, 2003 he applied for and obtained a Colorado issued Driver's License using the name and identity of Efrain Rios, with a listed date of birth of September 21, 1978. The address that was listed in support of this license was 749 Quincy St., Denver, CO 80224. In the case of Ricardo Sarabia, evidence was developed showing that on or about September 21, 2001 and/or again on December 13, 2002 he applied for and obtained a Colorado issued Driver's License using the name and identity of Luis Adrian Torres Esquilin, with a listed date of birth of November 18, 1959. The



address that was listed in support of this license was 4762 S. Ouray St., Aurora, CO 80015.

Once these two driver's licenses were obtained under fraudulent circumstances, on or about September 4-5, 2003, Ricardo Sarabia used the identity of Luis A. Torres and applied to be a Notary from the Colorado Secretary of State. It should be noted that the home address listed in the application was the same Ouray street address that was discussed above. Furthermore, his daughter-in-law, Lauren Maes a/k/a Lauren Maes Sarabia, served as the notary for this particular application where she affirmed that "Luis A. Torres" was the applicant. The Secretary of State did assign "Luis A. Torres" a notary commission and an identification number, based on this application. Evidence was then developed showing that the real Luis Adrian Torres Esquilin, with a date of birth of November 18, 1959, and a social security number of 584-25-8015, was a resident of Puerto Rico who later died on December 27, 2007 in Puerto Rico and had a criminal history in Puerto Rico as well.

Then, also on or about September 4-5, 2003, Jose Ricardo Sarabia Martinez used the identity of Efrain Rios and applied to be a Notary from the Colorado Secretary of State. In this application, the home address that was finally used was 749 Quincy St. in Denver, CO after the 11160 Huron St. address in Northglenn, CO had been initially written down and later crossed out as being the home address. Jose Ricardo Sarabia, Martinez' wife Lauren Maes a/k/a Lauren Maes Sarabia, served as the notary for this particular application where she affirmed that "Efrain Rios" was the applicant. The Secretary of State did assign "Efrian Rios" a notary commission and identification number.

**PREDICATE ACT NINETEEN**  
**(4819 Zuni Street, Denver)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about November 15, 2006 through April 2, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to Chase Bank and/or Chase Home Finance, with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive Chase Bank and/or Chase Home Finance, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT TWENTY**  
**(4819 Zuni Street, Denver)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) and C.R.S. § 18-2-201 (F4)**

On or about November 15, 2006 through April 2, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with one or more of the above named individuals, as well as a person or persons to the Grand Jury and the Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b),(2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT TWENTY-ONE**  
**(4819 Zuni Street, Denver, CO)**

**BANK FRAUD, 18 U.S.C. § 1344**

On or about November 15, 2006 through April 2, 2007, in the District of Colorado, State of Colorado, **Jose Ricardo Sarabia-Martinez, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez**, the defendants, unlawfully and knowingly executed or attempted to execute a scheme or artifice to defraud Chase Bank, a financial institution, by and through Chase Home Finance, its subsidiary, or to obtain any moneys, funds, credits, assets, securities, or other property from Chase Bank, a financial institution, by and through Chase Home Finance, by means of false or fraudulent pretenses, representations, or promises; in violation of 18 U.S.C. § 1344.

**PREDICATE ACT TWENTY-TWO**  
**(4819 Zuni Street, Denver, CO)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about November 15, 2006 through April 2, 2007, in the State of Colorado, **Lauren Maes Sarabia and Ricardo Sarabia-Salcido**, with the intent to defraud the BC Bancorp, Chase Bank and/or Chase Home Finance, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, Verification of Deposit, a Warranty Deed, a Deed of Trust, an Affidavit and Indemnity document, a Name Affidavit, a Limited Power of Attorney, a Rate Lock Request, and/or a Rate Option Confirmation; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Nineteen through Twenty-Two were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were used to summarize the Enterprise that was described above:

This “straw purchaser” fraud scheme began on or about November 15, 2006, when Salvador Vasquez responded to a media based marketing campaign that was conducted by Worldwide. Mr. Vasquez’ apparent goal was to purchase a home with the assistance of Worldwide that was based on Worldwide’s advertising. Mr. Vasquez initially interacted with an employee from Worldwide named “Ricardo” who was described as being heavy set and approximately 45-50 years of age. It is a reasonable inference that this person was Ricardo Sarabia-Salcido. While Mr. Vasquez did provide some financial information to “Ricardo” he did not fill out any paperwork prior to a closing. Mr. Vasquez stated that “Ricardo” informed him that he was eligible to purchase multiple properties that could be rented to others with the collected rent being used to pay off the mortgages. In fact, “Ricardo” said that Worldwide would find the renters. Mr. Vasquez stated to law enforcement that he earned \$11.00 per hour at that time and was reassured by “Ricardo” that the renters would pay the mortgage.

Based on Mr. Vasquez agreeing to buy one or more properties with the assistance of Worldwide, another Worldwide member, “Pedro” and/or Pedro Martinez, started the process to make it appear that Mr. Vasquez was qualified to purchase 4819 Zuni Street, Denver, CO for \$95,000.00 from Deutsche Bank. It is a reasonable inference that “Pedro” is Pedro Sarabia-Martinez. On or about November 17, 2006 Lauren M. Sarabia, serving in the capacity of a realtor, then entered into a Contract to Buy and Sell Real Estate with Mr. Vasquez regarding the Zuni property. Mr. Vasquez, who acknowledged that he does not read English, stated that the various documents related to the Zuni property that were presented to him were all in English. This process included the members of the Enterprise using various illicit acts and uttering false statements to obtain a loan for Mr. Vasquez. Some of these acts and statements included representing that Cameron Gray was a Mortgage Broker and/or lender involved in the process. Evidence was then developed that while paperwork stated that Mr. Vasquez brought funds in excess of \$5,300.00 to the closing Mr. Vasquez confirmed that he had brought no money to the closing. In fact a review of bank records showed that Lauren Maes Sarabia withdrew \$5,650.00 in funds on the same date of the earlier scheduled closing of February 1, 2007 that covered the funds that were represented on the HUD-1 settlement statement that falsely reflected that Mr. Vasquez was the one who had brought the funds to the closing. When this February 2007 closing finally occurred with Mr. Vasquez being guided by Worldwide’s leadership to purchase the Zuni property, Lauren Sarabia received a broker commission in the amount of \$2,575.00 for this sale that was priced at \$95,000.00.

Now that the Worldwide-centered Enterprise had control over the Zuni property; in February 2007 a second sale was being arranged by the Enterprise members between Mr. Vasquez, the original straw purchaser, as the seller and a Worldwide associate named Alexandria Grado, the follow-on straw purchaser, as the buyer/borrower. This subsequent sale occurred on March 29, 2007 with a sales price of \$205,000.00.

Ms. Grado stated to law enforcement that her involvement with Worldwide began when she met Ricky (Jose Ricardo Sarabia-Martinez) and was hired by him to work as a model and as a receptionist. At some time during her employment she was approached by Ricky and was asked by him to use her credit and name to purchase a property for him because he had renters ready to go who would pay rent, and in turn pay the mortgage. Ms. Grado, who trusted Ricky, agreed to this and stated that she did sign paperwork associated with the the Zuni property. For her efforts of acquiring the Zuni property Ms. Grado was paid \$2,000.00 by Worldwide. Ms. Grado, who never lived at Zuni and apparently had no involvement with the property after the March 29, 2007 closing, stated that she only learned about a problem with Zuni when Chase Bank started contacting her in 2009 regarding delinquent payments for the property’s mortgage.

The Grand Jury then learned certain specifics regarding this second straw purchase by Grado from Vasquez. Ms. Grado confirmed that she knew Ricky, Ricardo (Ricky's father), Lauren, Pedro and Pablo. Ms. Grado confirmed that the loan application was inaccurate because it stated that she earned \$5,000.00 per month at Ideavision when she really earned approximately \$2,000.00-\$2,500.00 per month. Ms. Grado was unfamiliar with the name of Cameron Gray, who supposedly conducted a telephone interview with her in support of this loan application. Pablo Sarabia-Martinez was responsible tendering the following documents to Chase for its detrimental reliance: a Rate Option Confirmation, the Rate Lock Request and the Chase Home Financing Package Receipt Confirmation and a Conditional Loan Disposition.

Ms. Grado also stated that she never had to bring any funds to any closing that she did with/or for Worldwide. In fact, Ms. Grado recounted a time that Lauren (reasonably believed to be Lauren Maes Sarabia) went with Grado to US Bank (Grado's bank) and that Lauren deposited approximately \$15,000.00 into Ms. Grado's account. During this encounter Ms. Grado stated that Lauren instructed her to not touch the money and that it would be withdrawn from this account within a few days. Investigators found a \$18,500.00 check, dated March 23, 2007, written on a Worldwide account that was payable to Ms. Grado and then deposited into Ms. Grado's US Bank checking account. Apparently this infusion of cash by Lauren Maes Sarabia then artificially inflated the balance in Ms. Grado's account to bolster the funds in Ms. Grado's account that needed verification for the deceived lender. Ms. Grado confirmed that Lauren also served as her realtor for this real estate transaction. Ms. Grado also confirmed that the March 29, 2007 US Bank Official Check for \$3,348.72 that was payable to United Title Company with Ms. Grado as the remitter were not funds that she personally brought to the closing. A review of Chase bank records for a Worldwide Mortgage Inc. checking account from March 29, 2007 shows a withdrawal of \$3,400.00 that was likely used to fund the buyer's funds that were supposedly brought to closing on the same date.

As part of this March 29, 2007 closing it appears that the Grand Jury record accounted for a variety of legal documents that were signed by Ms. Grado and/or Mr. Vasquez that were supposedly notarized by "Luis Torres" even though Ms. Grado did not know Luis Torres nor was he (Torres) notarizing the documents while she was signing them.

Following Chase Bank and Chase Home Finance (Chase) detrimentally relying upon this fraudulent use of a straw buyer by the members of the Enterprise as well as the other acts and statements in support of using Ms. Grado, the remaining funds from the \$194,056.94 Chase funded loan were first diverted to Teresa Martinez on April 2, 2007. The amount of the remaining funds totalled \$99,569.89. Also occurring on April 2, 2007 these same funds went into and out of three separate Chase Bank accounts owned by or affiliated with the Enterprise and its members, finally ending up in Worldwide Mortgage Inc.'s account, even though Mr. Vasquez was listed as the supposed seller. Ultimately, the Zuni property went into foreclosure in 2009 and negatively impacted Ms. Grado's financial status. Regardless of the collateral financial damage that was caused to Ms. Grado, the named members of the Enterprise worked as principals and/or in a complicit

manner with each other to execute a scheme by using two straw buyers to ultimately defraud Chase by taking a thing a value, funds in excess of \$15,000.00 with the intent to permanently deprive Chase of these funds.

**PREDICATE ACT TWENTY-THREE**  
**(2606 S. Laredo Court, Aurora)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about January 11, 2007 through March 15, 2007 and initially discovered on or about October 20, 2011, in the State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to First Franklin Financial Corp., with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive First Franklin Financial Corp., permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT TWENTY-FOUR**  
**(2606 S. Laredo Court, Aurora)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) and C.R.S. § 18-2-201 (F4)**

On or about January 11, 2007 through March 15, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with one or more of the above named individuals, as well as a person or persons to the Grand Jury and the Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b),(2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT TWENTY-FIVE**  
**(2606 S. Laredo Court, Aurora)**

**BANK FRAUD, 18 U.S.C. § 1344**

On or about January 11, 2007 through March 15, 2007, in the District of Colorado, State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez**, the defendants, unlawfully and knowingly executed or attempted to execute a scheme or artifice to defraud, MLB&T Bank FSB, a financial institution, through First Franklin Financial Corp., its subsidiary, or to obtain any moneys, funds, credits, assets, securities, or other property from MLB&T Bank, FSB, a financial institution, through First Franklin Financial Corp., its subsidiary, by means of false or fraudulent pretenses, representations, or promises; in violation of 18 U.S.C. § 1344.

**PREDICATE ACT TWENTY-SIX**  
**(2606 S. Laredo Court, Aurora)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 11, 2007 through March 15, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Plaza Home Mortgage Inc. and/or First Franklin Financial Corp., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Loan Applications, an Occupancy Declaration, a Warranty and Compliance Agreement, a Verification of Deposit, HUD-1 Settlement Statements, a Warranty Deed, a Deed of Trust, an Affidavit and Indemnity document, a Signature Affidavit and AKA Statement, a Correction Agreement and Limited Power of Attorney, a Power of Attorney, a Rate Lock Request, and/or a Rate Option Confirmation; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Twenty-Three through Twenty-Six were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

This “straw purchaser” fraud scheme began on or about January 11-12, 2007, when Rey Martinez, who had been offered a job by Ricky Sarabia to show houses for Sarabia’s company, had his name and identity used by the Enterprise to start the process of purchasing 2606 S. Laredo Ct. in Aurora, CO from a seller (South Point Inc.) for \$125,000.00. The first step of this process that occurred was the use of a suspicious loan application that was created by or at the direction of the members of the Enterprise, that

was later sent to a lender (Plaza Home Mortgage Inc.) to secure a loan for Mr. Martinez. On the eve of the January 12, 2007 closing, Mr. Martinez signed a Power of Attorney that was notarized by “Luis Torres” (Ricardo Sarabia-Salcido) authorizing Andre Guerra, an associate of Worldwide, to serve as his Attorney-in-Fact to conduct the real estate transactions that were related to the S. Laredo property. For example, when this January 2007 closing occurred with Mr. Martinez being represented to the lender as the purchaser, the HUD-1 settlement statement that was created and uttered falsely stated that Mr. Martinez had brought buyer funds, in excess of \$5,000.00, to the closing. Evidence was developed that Lauren Sarabia, a/k/a Lauren Maes, had in fact withdrawn these buyer funds from the Worldwide Mortgage account at Chase that was then used to falsely represent that these were Mr. Martinez’ own funds. In addition to this act, evidence was developed showing that Lauren Sarabia, a/k/a Lauren Maes, also received a realtor’s commission in excess of \$3,000.00 for this “straw purchase” by Rey Martinez.

Once the S. Laredo property was under the control of the Enterprise, due to the fraud that had been employed by the Enterprise members, another straw purchaser, Jose Perez, was brought in to act as the buyer with Rey Martinez serving as the seller of the same S. Laredo property. This follow-on transaction began in February 2007 and culminated on or about March 14, 2007 with a second closing. The sales price for this second closing (Martinez to Perez), which occurred on or about March 14, 2007, was for \$172,000.00.

Mr. Perez was interviewed by the FBI and stated that he found out about Worldwide and was ultimately told by that company that he could be qualified to purchase three (3) homes and that he would only have to live in a property for one (1) year before he could sell them for a profit. He was also told that Worldwide would find and place renters whose rents would pay off the mortgages. Mr. Perez stated that he did live in one (1) of the three (3) properties (a property on Sable in Aurora) that he had bought for only about one (1) year but was unable to keep up with the payments before it was foreclosed. He later found out that the two other properties, including this property on S. Laredo and another on Durham Ct. in Denver, were also foreclosed by the lenders.

Additionally, some of the other key behaviors that constituted fraud in this second sales transaction for S. Laredo included the following members of the Enterprise doing the following:

**Ricardo Sarabia-Salcido** serving as the contact on an Appraisal Invoice, as well as him using or allowing the “Luis Torres” Notary to be used on numerous legal documents, including but not limited to a Warranty Deed, a Deed of Trust, a Signature Affidavit and AKA Statement, an Occupancy Declaration, a Correction Agreement and Limited Power of Attorney that were designed to deceive Plaza Home Mortgage and First Franklin Financial Corp.;

**Pablo Sarabia-Martinez** serving as the contact on the rate lock confirmation and on a title company cover letter, as well as him conditionally approving the straw buyer, Jose Perez, for a loan being obtained from First Franklin Financial Corp.;



**Cameron Gray's** name and identity falsely being used by the Enterprise as the loan officer for Mr. Perez; and

**Teresa Martinez** being authorized via a letter to receive the disbursement of funds instead of Rey Martinez upon the second closing being completed. This act allowed for the proceeds from this next sale, that were in excess of \$40,000.00, to be routed to her via a wire on behalf of the Enterprise. This money was from the loan that had been fraudulently obtained from MLB&T, FSB, via its subsidiary First Franklin Financial Corp.

**PREDICATE ACT TWENTY-SEVEN**  
**(1014 Sable Blvd, Aurora)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about January 31, 2007 through March 29, 2007 and initially discovered on or about October 20, 2011, in the State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to Countrywide Home Loans Inc., with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive Countrywide Home Loans, Inc, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT TWENTY-EIGHT**  
**(1014 Sable Blvd. Aurora)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) and C.R.S. § 18-2-201 (F4)**

On or about January 31, 2007 through March 29, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with one or more of the above named individuals, as well as a person or persons to the Grand Jury and the Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(a),(2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT TWENTY-NINE**  
**(1014 Sable Blvd., Aurora)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 31, 2007 through March 29, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Countrywide Home Loans, Inc., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, a HUD-1 Settlement Statement, a Bill of Sale, a Warranty Deed, a Deed of Trust, an Affidavit and Indemnity document, an Identity Affidavit, a Limited Power of Attorney, and a Closing Agent/Notary Public Certification; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Twenty-Seven through Twenty-Nine were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

This “straw purchaser” fraud began on or about January 31, 2007, when Hilaneh Marcus, an acquaintance of Teresa Martinez, conducted a real estate purchase transaction regarding 1014 Sable Blvd in Aurora, CO. The purchase price was \$111,000.00. Sometime before this date Ms. Marcus had been approached by Lauren Sarabia who offered Ms. Marcus an opportunity to make some money. The basic concept of this business proposal was that Ms. Marcus would sign her name on various documents to help Lauren’s company (Worldwide) obtain these properties for a subsequent resale, thus allowing Ms. Marcus to make some money for the use of her name. Ms. Marcus was interviewed by law enforcement and she acknowledged that she did sign various documents related to multiple real estate transactions, but that she did not consider these to be real estate purchases since she did not pay any money for these properties, because Lauren and Worldwide covered all of the costs. While Ms. Marcus thought that she was involved in 4-5 properties, with her typically, but not always, receiving approximately \$2,500-\$5,000 per property, law enforcement observed that Ms. Marcus was involved in more than that amount.

Following Ms. Marcus and the Enterprise now having control over the Sable property Lauren Sarabia started the second and key phase of the fraud by serving as the listing agent for this property with Ms. Marcus serving as the seller and Jose Perez, the same “buyer” from the Laredo property again serving as the new “straw buyer.” The sales price that was set for this second sale was \$185,000.00 with a closing date now set for March 28, 2007. As was shown in the record, other members of the Worldwide family who had a role in this transaction included: Pablo Sarabia-Martinez, Teresa Martinez and Ricardo Sarabia-Salcido. Again, as was seen with the Laredo property, the loan application for Mr. Perez contained information that was both materially false and/or

ommitted other material information, including a representation that Cameron Gray was the approving loan officer. Countrywide Home Loans, Inc. detrimentally relied on this information or the lack information and funded this loan.

At the time of the closing the seller proceeds that were in excess of \$70,000.00, were first routed to Teresa Martinez and Lauren Sarabia with the funds ultimately being moved into a Worldwide account in a manner that was consistent with what was observed with movement of funds in the Zuni and Laredo properties. The HUD-1 settlement statement did not reflect this routing of the seller proceeds. Furthermore, Worldwide Mortgage, Inc. also received funds in excess of \$3,000.00 related to this “straw purchase” for a fees such as for originating the loan. Finally, various legal documents related to this real estate transaction were notarized by “Luis Torres” before they were uttered. Ultimately, as Mr. Perez had stated regarding Laredo, the Sable property was foreclosed on or about July 21, 2009.

**PREDICATE ACT THIRTY**  
**(4360 Durham Ct, Denver)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about January 17, 2007 through April 26, 2007 and initially discovered on or about October 20, 2011, in the State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to US Bank N.A., with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive US Bank, N.A, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT THIRTY-ONE**  
**(4360 Durham Ct., Denver)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) and C.R.S. § 18-2-201 (F4)**

On or about January 17, 2007 through April 26, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with one or more of the above named individuals, as well as a person or persons to the Grand Jury and the Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b),(2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT THIRTY-TWO**  
**(4360 Durham Ct., Denver)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 17, 2007 through April 26, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Countrywide Home Loans, Inc., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, a HUD-1 Settlement Statement, a Bill of Sale, a Warranty Deed, a Deed of Trust, an Affidavit of Occupancy, an Affidavit and Indemnity document, an Name Affidavit, a Compliance Agreement, a Power of Attorney, and a Limited Power of Attorney; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT THIRTY-THREE**  
**(4360 Durham Ct., Denver)**

**BANK FRAUD, 18 U.S.C. § 1344**

On or about January 17, 2007 through April 26, 2007, in the District of Colorado, State of Colorado, **Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez**, the defendants, unlawfully and knowingly executed or attempted to execute a scheme or artifice to defraud, US Bank, a financial institution, or to obtain any moneys, funds, credits, assets, securities, or other property from US Bank, a financial institution, by means of false or fraudulent pretenses, representations, or promises; in violation of 18 U.S.C. § 1344.

The offenses alleged in Predicate Acts Thirty through Thirty-Three were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

On or about January 17, 2007, Salvador Vasquez, the same straw buyer who was used by the Enterprise to conduct the first part of Zuni transaction on January 10, 2007, was again used by the Enterprise as a straw buyer to purchase 4360 Durham Ct. in Denver, CO from a bank for \$125,800.00. As part of this scheme to defraud a notarized Power of Attorney was executed between Mr. Vasquez and Teresa Martinez with “Luis Torres” serving as the notary, which authorized Ms. Martinez to serve as the Attorney in Fact for this first purchase. Once the Enterprise had control of this property the same pattern and scheme was followed by the Enterprise by using the same Jose Perez as the “straw buyer” in the second transaction to obtain a loan from US Bank for the eventual sale of the Durham property from Mr. Vasquez to Mr. Perez that occurred on or about April 20, 2007 for \$190,000.00. Again, as was seen with the earlier properties, the loan application for Mr. Perez in this matter contained information that was both materially false and/or omitted other material information, including a representation that Cameron Gray was the approving loan officer. US Bank detrimentally relied on this information or the lack information and funded this loan.

Again, Lauren Sarabia served as the listing agent, Pablo Sarabia-Martinez was listed as having a role with the transaction and serving as the point of contact, while “Luis Torres” (Ricardo Sarabia-Salcido) notarized various legal documents related to the closings for this Durham property. Furthermore, contemporaneous with the date of second closing in April 2007, the bulk of the seller proceeds that were in excess of \$49,000.00 were routed away from Mr. Vasquez to Teresa Martinez and Lauren Sarabia with these funds ultimately being moved into a Worldwide account in a manner that was consistent with what was observed with movement of funds in the earlier properties. The HUD-1 settlement statement also did not reflect this routing of the seller proceeds. Furthermore, Worldwide Mortgage, Inc. also received funds in excess of \$2,600.00 related to this “straw purchase” for fees such as for originating the loan.

On or about April 1, 2008 the Durham Ct. property went into foreclosure, with Mr. Perez being left financially responsible like he was on the S. Laredo and Sable properties as well, while the members of the Enterprise acquired the financial benefits of this illicit scheme.

**PREDICATE ACT THIRTY-FOUR**  
**(11489 E. 1<sup>st</sup> Ave., Aurora)**

**THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about January 16, 2008 through February 14, 2008, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to JP Morgan Chase Bank and/or Chase Home Finance, with the value of twenty thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive JP Morgan Chase Bank and/or Chase Home Finance, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT THIRTY-FIVE**  
**(11489 E. 1<sup>st</sup> Ave., Aurora)**

**CONSPIRACY TO COMMIT THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)**

On or about January 16, 2008 through February 14, 2008, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia** with the intent to promote or facilitate the commission of the crime of Theft-\$20,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was twenty thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT THIRTY-SIX**  
**(11489 E. 1<sup>st</sup> Ave., Aurora)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 16, 2008 through February 14, 2008, in the State of Colorado, **Lauren Maes Sarabia**, with the intent to defraud the JP Morgan Chase Bank and/or Chase Home Finance, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, a HUD-1 Settlement Statement, a Gift Letter, and/or a Request for Verification of Employment, and Paystubs; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT THIRTY-SEVEN**  
**(11489 E. 1<sup>st</sup> Ave., Aurora)**

**BANK FRAUD, 18 U.S.C. § 1344**

On or about January 16, 2008 through February 14, 2008, in the District of Colorado, State of Colorado, **Lauren Maes Sarabia and Jose Ricardo Sarabia-Martinez**, the defendants, unlawfully and knowingly executed or attempted to execute a scheme or artifice to defraud, JP Morgan Chase Bank and/or its subsidiary, Chase Home Finance, both financial institutions, or to obtain any moneys, funds, credits, assets, securities, or other property from JP Morgan Chase Bank and/or its subsidiary, Chase Home Finance, both financial institutions, by means of false or fraudulent pretenses, representations, or promises; in violation of 18 U.S.C. § 1344.

The offenses alleged in Predicate Acts Thirty-Four through Thirty-Seven were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

On or about January 16, 2008 Jose Ricardo Sarabia-Martinez and his company purchased 11489 E. 1<sup>st</sup> Ave. in Aurora, CO for \$110,000.00. Less than one month later on February 14, 2008, Alexandria Grado, the same same “straw buyer” from an earlier transaction was used by the Enterprise to again serve as a “straw buyer” during the key second transaction for this same property. The sales price for this second sale that occurred less than one month later was \$205,000.00 with a loan that was funded by JP Morgan Chase Bank following certain acts and/or statements being uttered by Lauren Maes Sarabia and Jose Ricardo Sarabia-Martinez. Some of the additional key acts that supported the fraudulent behavior to deceive JP Morgan Chase Bank in this transaction are the following:

Lauren Maes Sarabia serving as the mortgage broker and submitting a loan application for Alexandria Grado which contained materially false information, such as:

Ms. Grado's stated monthly salary being inflated;

The use of Cameron Gray's name to register the Grado loan and lock the rate of the loan;

The submission of a Request for Verification of Employment and Paystubs regarding Ms. Grado's employment with and inflated salary from Sarabia-Martinez' Ideavision business, using an Andre Guerra, a Worldwide associate, as the submitter;

The creation and uttering of a fraudulent Gift Letter that purportedly showed that Alexandria Grado received a \$15,000.00 gift from her father to purchase this property when the evidence showed that in reality Lauren Maes Sarabia wrote a \$15,000.00 to Ms. Grado from a Worldwide Investments Firm, Inc bank account on the same day that the Gift Letter was prepared. This money was then deposited into Grado's account at US Bank to artificially make it appear that Ms. Grado possessed these funds to support Chase funding the loan that was excess of \$20,000.00. As a result the HUD-1, as signed by Jose Ricardo Sarabia-Martinez, was not accurate; and

Lauren Maes Sarabia withdrawing \$11,000.00 on February 14, 2008 from a Worldwide account that was apparently used to represent the funds that Ms. Grado was supposed to bring to the closing as a down payment making this appear to be a legitimate transaction as if the funds had actually originated with Ms. Grado.

In the end, with the various deceptive acts and statements being used by Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia, JP Morgan Chase Bank was deceived into funding a loan that ultimately allowed the named defendants to receive \$67,051.28 in ill gotten proceeds plus another \$2,297.50 in mortgage commissions. Finally, on November 25, 2009 this property went into foreclosure.



**PREDICATE ACT THIRTY-EIGHT**  
**(987 Wheeling St., Aurora)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about January 1, 2007 to April 12, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Ricardo Sarabia-Salcido, Lauren Maes Sarabia, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to Alliance Bancorp, with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive Alliance Bancorp, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT THIRTY-NINE**  
**(987 Wheeling St., Aurora)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)**

On or about January 1, 2007 through April 12, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Ricardo Sarabia-Salcido, Lauren Maes Sarabia, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT FORTY**  
**(987 Wheeling St., Aurora)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 1, 2007 through April 12, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Alliance Bancorp, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Various notarized documents such as an Assignment of Deed of Trust or Mortgage Deed, a Compliance Agreement, Compliance Agreement and Power of Attorney, Document Correction Compliance Agreement, One and the Same Name Affidavit, and a Deed of Trust; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Thirty-Eight through Forty were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

Beginning on or about January 1, 2007, the Worldwide-centered Enterprise, consisting of Pedro Sarabia-Martinez and Lauren Maes Sarabia, initially enlisted Hilaneh Marcus to serve as a straw buyer so that they (Worldwide and its key individual players) could take possession of this property for an eventual second sale to another straw buyer, Rey Martinez, so that the funds from a fraudulent loan obtained from Alliance Bancorp could be used to financially benefit the Enterprise. This transaction started with Pedro Sarabia serving as loan officer and signing off that Ms. Marcus was qualified to receive a loan to buy 987 Wheeling St. in Aurora, CO. Contemporaneous to this occurrence, Lauren Maes Sarabia entered into a Contract to Buy and Sell Real Estate with Ms. Marcus for the Wheeling residence. Later Ms. Maes Sarabia ordered an Appraisal for the Wheeling address. On or about February 12, 2007 (the date that Ms. Marcus closed on the Wheeling the address) Lauren Maes Sarabia withdrew funds from a Worldwide account that served as the down payment that Ms. Marcus was falsely being represented as having brought to the closing to buy this residence. As was described in an earlier transaction involving Ms. Marcus she was willing to assist Worldwide and its family members, Ms. Marcus denied bringing any funds to this closing. In addition, both Lauren Maes Sarabia and Worldwide Mortgage received commissions or fees, in excess of \$1,000.00 for this purchase that occurred through deceptive tactics, actions and/or statements. The sales price for this February 12, 2007 transaction was for \$105,000.00.

Once the Enterprise had control of the Wheeling property as of February 12, 2007, the Enterprise then shifted towards re-enlisting Rey Martinez to serve as the follow-on straw buyer who was being portrayed by the Enterprise to a lender, Alliance

Bancorp, as a viable and approved buyer of the Wheeling property from Ms. Marcus. As was observed before, Lauren Maes Sarabia served as the real estate agent by drafting a Contract between Hilaneh Marcus as the seller and Rey Martinez as the buyer, while Pablo Sarabia-Martinez served as the loan officer on various title orders for this property. Finally, on or about April 11, 2007, a closing occurred with Marcus selling Wheeling to the straw buyer, Rey Martinez, for \$195,000.00 after a loan had been deceptively obtained from Alliance Bancorp. As part of this closing, Ricardo Sarabia-Salcido used the Luis A. Torres notary commission to falsely notarize a series of legal documents, that were intended to deceive Alliance Bancorp. These documents included, but were not limited to an Assignment of a Deed of Trust or Mortgage Deed, a Deed of Trust, a Compliance Agreement, a Compliance Agreement and Power of Attorney, and a Documentation Correction Compliance Agreement. In a manner that was similarly observed in other related transactions, with Rey Martinez stating that he did not bring any funds to the April 2007 closing, evidence was developed showing that Lauren Maes Sarabia withdrew funds in excess of \$9,800.00 from a Worldwide account that was then made available to make it appear that Rey Martinez had brought funds to this closing. Once Alliance Bancorp was deceived into funding this loan, Worldwide, primarily through the actions of and accounts controlled by Teresa Martinez, received \$84,311.70 in ill gotten funds from this straw sale plus it received three checks, totalling in excess of \$2,300.00, that had been written to Ms. Marcus who in turn endorsed them over to Worldwide Mortgage. In addition Worldwide Mortgage received a commission in excess of \$1,000.00 for brokering this fraudulent loan. On April 4, 2008, the Wheeling property was foreclosed.

**PREDICATE ACT FORTY-ONE**  
**(2025 W. 46<sup>th</sup> Ave., Denver)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about December 28, 2006 to June 12, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to Countrywide Home Loans, with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive Countrywide Home Loans, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT FORTY-TWO**  
**(2025 W. 46<sup>th</sup> Ave., Denver)**

CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)

On or about December 28, 2006 through June 12, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT FORTY-THREE**  
**(2025 W. 46<sup>th</sup> Ave., Denver)**

FORGERY, C.R.S. § 18-5-102(1)(c) (F5)

On or about December 28, 2006 through June 12, 2007, in the State of Colorado, **Pablo Sarabia-Salcido and Pedro Sarabia-Martinez**, with the intent to defraud the Guarenteed Rate, Inc and/or Countrywide Home Loans, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Uniform Residential Loan Applications; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Forty-One through Forty-Three were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

Beginning on or about December 28, 2006 the Worldwide centered Enterprise, consisting of Pablo Sarabia-Martinez and Lauren Maes Sarabia, initially enlisted Hilaneh Marcus to serve as a straw buyer so that they (Worldwide and its key individual players) could take possession of this property for an eventual second sale to another straw buyer, Rey Martinez, so that a fraudulent loan from Countrywide Home Loans could be used to financially benefit the Enterprise. This transaction started with Pablo Sarabia serving as loan officer and signing off that Ms. Marcus was qualified to receive a loan to buy 2025 W. 46<sup>th</sup> Ave. in Denver, CO. Contemporaneous to this occurrence Lauren Maes Sarabia entered into a Contract to Buy and Sell Real Estate with Ms. Marcus for the W. 46<sup>th</sup>

residence. Later Pablo Sarabia ordered an Appraisal for the W. 46th address. The sales price for this December 28, 2006 transaction was for \$117,500.00. In addition, Worldwide Mortgage received commissions or fees, in excess of \$1,000.00 for this purchase that occurred through deceptive tactics, actions and/or statements.

Once the Enterprise had control of the W. 46<sup>th</sup> property as of December 28, 2006, the Enterprise then shifted towards re-enlisting Rey Martinez to serve as the follow-on straw buyer who was being portrayed by the Enterprise to a lender, Countrywide Home Loans, as a viable and approved buyer of the W.46<sup>th</sup> Ave. property from Ms. Marcus. As was observed before Lauren Maes Sarabia served as the real estate agent by drafting a Contract between Hilaneh Marcus as the seller and Rey Martinez as the buyer, while Pedro Sarabia-Martinez served as the loan officer on various title orders for this property. Finally, on or about June 11, 2007, a closing occurred with Hilaneh Marcus selling W. 46<sup>th</sup> Ave to the straw buyer, Rey Martinez, for \$200,000.00 after a loan had been deceptively obtained from Countrywide Home Loans. In a manner that was similarly observed in other related transactions, with Rey Martinez stating that he did not bring any funds to the June 11, 2007 closing, evidence was developed showing that Lauren Maes Sarabia withdrew funds totalling \$8,700.00 from a Worldwide account that was then made available to make it appear that Rey Martinez had brought funds to this closing. Also Rey Martinez' listed salary and employment information on the loan application was deceptively and intentionally incorrect. Once Countrywide Home Loans was deceived into funding this loan, Worldwide, primarily through the actions of and accounts controlled by Lauren Maes Sarabia and Jose Ricardo Sarabia-Martinez, received in excess of \$67,000.00 in ill gotten funds from this straw sale plus Ms. Marcus received a check of \$2,500.00 from this deal. In addition Worldwide Mortgage received a commission for brokering this fraudulent loan. On March 2, 2009, the W.46<sup>th</sup> Ave. property was foreclosed.

**PREDICATE ACT FORTY-FOUR**  
**(16409 E. 18<sup>th</sup> Place, Aurora)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about January 15, 2007 to June 15, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to Chase Bank N.A., with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive Chase Bank, N.A., permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT FORTY-FIVE**  
**(16409 E. 18<sup>th</sup> Place, Aurora)**

CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)

On or about January 15, 2007 through June 15, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT FORTY-SIX**  
**(16409 E. 18<sup>th</sup> Place, Aurora)**

FORGERY, C.R.S. § 18-5-102(1)(c) (F5)

On or about January 15, 2007 through June 15, 2007, in the State of Colorado, **Pablo Sarabia-Martinez**, with the intent to defraud the Chase Bank N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Verification of Employment document; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT FORTY-SEVEN**  
**(16409 E. 18<sup>th</sup> Place, Aurora)**

**BANK FRAUD, 18 U.S.C. § 1344**

On or about January 15, 2007 through June 11, 2007, in the District of Colorado, State of Colorado, **Lauren Maes Sarabia, Jose Ricardo Sarabia-Martinez, Pablo Sarabia-Salcido, Pedro Sarabia-Martinez and Teresa Martinez**, the defendants, unlawfully and knowingly executed or attempted to execute a scheme or artifice to defraud, Chase Bank, a financial institution, or to obtain any moneys, funds, credits, assets, securities, or other property from Chase Bank, a financial institution, by means of false or fraudulent pretenses, representations, or promises; in violation of 18 U.S.C. § 1344.

The offenses alleged in Predicate Acts Forty-Four through Forty-Seven were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

Beginning on or about January 15, 2007 the Worldwide centered Enterprise, consisting of Pedro Sarabia-Martinez and Lauren Maes Sarabia, initially enlisted Hilaneh Marcus to serve as a straw buyer so that they (Worldwide and its key individual players) could take possession of this property for an eventual second sale to another straw buyer, Rey Martinez, so that a fraudulent loan from Chase Bank could be used to financially benefit the Enterprise. This transaction started with Pedro Sarabia serving as loan officer and falsely signing off that Ms. Marcus was qualified to receive a loan to buy 16409 E. 18<sup>th</sup> Place in Aurora, CO. Contemporaneous to this occurrence, Lauren Maes Sarabia entered into a Contract to Buy and Sell Real Estate with Ms. Marcus for the E. 18<sup>th</sup> residence. The sales price for this March 1, 2007 transaction was for \$120,000.00. In addition, Lauren Maes Sarabia received real estate commissions in excess of \$1,000.00 for this purchase that occurred through the use of deceptive tactics, actions and/or statements.

Once the Enterprise had control of the E. 18<sup>th</sup> property as of March 1, 2007, the Enterprise then shifted towards re-enlisting Rey Martinez to serve as the follow-on straw buyer who was being portrayed by the Enterprise to a lender, Chase Bank, as a viable and approved buyer of the E. 18<sup>th</sup> Ave. property from Ms. Marcus. As was observed before Pedro and Pablo Sarabia-Martinez served as the loan correspondents and Teresa Martinez ordered the appraisal. As part of Pablo's role with the fraudulent scheme he submitted a fraudulent Request for Verification of Employment to the lender. Finally, on or about June 15, 2007, a closing occurred with Ms. Marcus selling E. 18<sup>th</sup> Ave to the straw buyer, Rey Martinez, for \$190,000.00 after a loan had been deceptively obtained from Chase Bank. Rey Martinez' listed salary and employment information on the loan application was deceptively and intentionally incorrect. Once Chase Bank was deceived into funding this loan, Worldwide, primarily through the actions of and accounts controlled by Lauren Maes Sarabia and Jose Ricardo Sarabia-Martinez, received in excess of \$60,000.00 in ill gotten funds from this straw sale plus Ms. Marcus received as check for \$2,000.00 and Mr. Martinez received a check of \$1,000.00 from this deal. It should be noted that Ms.

Marcus submitted a private letter payoff authorizing the profits from this sale to be diverted to Jose Ricardo Sarabia-Martinez. In addition Worldwide Mortgage received a commission of \$3,466.72 for brokering this fraudulent loan. On May 12, 2008, the E. 18<sup>th</sup> Ave. property was foreclosed.

**PREDICATE ACT FORTY-EIGHT**  
**(1048 Tucson St., Aurora)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about October 16, 2006 to January 18, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Lauren Maes Sarabia, Ricardo Sarabia-Salcido, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to First Franklin Financial Corp., with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive, First Franklin Financial Corp permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT FORTY-NINE**  
**(1048 Tucson St., Aurora)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)**

On or about October 16, 2006 through January 18, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Lauren Maes Sarabia, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.



**PREDICATE ACT FIFTY**  
**(1048 Tucson St., Aurora)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about October 16, 2006 through January 18, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the First Franklin Financial Corp, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to a Warranty Deed and a Bill of Sale; in violation of section 18-5-102(1)(c), C.R.S.

**PREDICATE ACT FIFTY-ONE**  
**(1048 Tucson St., Aurora)**

**BANK FRAUD, 18 U.S.C. § 1344**

On or about October 16, 2006 through January 18, 2007, in the District of Colorado, State of Colorado, **Lauren Maes Sarabia, Jose Ricardo Sarabia-Martinez, Pablo Sarabia-Salcido, Pedro Sarabia-Martinez and Teresa Martinez**, the defendants, unlawfully and knowingly executed or attempted to execute a scheme or artifice to defraud, First Franklin Financial, a subsidiary of MLB & T CO, FSB, a financial institution, or to obtain any moneys, funds, credits, assets, securities, or other property from First Franklin Financial, a subsidiary of MLB & T CO, FSB, a financial institution, by means of false or fraudulent pretenses, representations, or promises; in violation of 18 U.S.C. § 1344.

The offenses alleged in Predicate Acts Forty-Eight through Fifty-One were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

Beginning on or about October 16, 2006 the Worldwide-centered Enterprise, consisting of Pedro Sarabia-Martinez and Lauren Maes Sarabia, initially enlisted Rey Martinez to serve as a straw buyer so that they (Worldwide and its key individual players) could take possession of this property for an eventual second sale to another straw buyer, Augustin Herrera, so that a fraudulent loan from First Franklin Financial Corp. could be used to financially benefit the Enterprise. This transaction started with Pedro Sarabia serving as loan officer and falsely signing off that Mr. Martinez was qualified to receive a loan to buy 1048 Tucson St. in Aurora, CO. Contemporaneous to this occurrence, Lauren Maes Sarabia entered into a Contract to Buy and Sell Real Estate with Mr. Martinez for the Tucson residence. The sales price for this December 1, 2006 transaction was for \$135,000.00. Evidence was developed showing that at the time of

the first closing that involved Mr. Martinez as the straw buyer Lauren Maes Sarabia withdrew funds in excess of \$6,000.00 from a Worldwide account which was designed to falsely serve as the down payment that Mr. Martinez was supposed to have brought as part of the sale. Mr. Martinez denies that he contributed any funds to this closing. In addition Lauren Maes Sarabia received real estate commissions, in excess of \$1,000.00, for this purchase that occurred through the use of deceptive tactics, actions and/or statements.

Once the Enterprise had control of the Tucson St. property as of December 1, 2006, the Enterprise then shifted towards re-enlisting Augustin Herrera to serve as the follow-on straw buyer who was being portrayed by the Enterprise to a lender, First Franklin Financial Corp, a subsidiary of MLB & T CO, FSB, as a viable and approved buyer of the Tucson St. property from Mr. Martinez. As was observed in other transactions Teresa Martinez ordered the appraisal, Lauren Maes Sarabia entered into a real estate sales contract with Mr. Herrera, a fraudulent loan application was prepared and submitted, along with Ricardo Sarabia-Salcido serving as a loan correspondent. Then on or about January 17, 2007, a closing occurred with Rey Martinez selling the Tucson St. property to the straw buyer, Mr. Herrera, for \$195,000.00 after a loan had been deceptively obtained from First Franklin Financial Corp. Augustin Herrera's loan application that was prepared and submitted by the Enterprise was deceptive and intentionally incorrect, especially regarding there being no reference to another property, 1245 Granby, that Mr. Herrera had just purchased on January 9, 2007. Furthermore, as has been observed before Lauren Maes Sarabia withdrew \$10,000.00 from an Enterprise controlled account that was apparently used to deceive the lender because this amount apparently served to represent the \$9,750.00 that Augustin Herrera was supposed to bring as part of the closing. Herrera denied bringing any funds to this closing. Ricardo Sarabia-Salcido was again using the Luis Torres notary commission to complete and utter various legal documents that were related to this second closing.

Once First Franklin Financial Corp. was deceived into funding this loan, Worldwide, primarily through the actions of and accounts controlled by Teresa Martinez, received in excess of \$56,000.00 in ill gotten funds from this straw sale plus Mr. Martinez received a check for \$1,500.00 from this deal that also incorporates a deal for 16794 E. Asbury Ave in Aurora. It should be noted that Mr. Martinez submitted a private payoff letter authorizing the profits from this sale to be diverted to Teresa Martinez. In addition, Worldwide Mortgage received a commission of \$2,060.05 for brokering this fraudulent loan and Pablo Sarabia-Martinez contemporaneously received a check from Worldwide Mortgage for \$4,039.00. Pablo Sarabia-Martinez also tendered three documents known as a Verification of Deposit, a Verification of Employment and Lock and Document Request that were fraudulent and were ultimately sent to First Financial Corp. re. Mr. Herrera. On June 17, 2008, this property was foreclosed.

**PREDICATE ACT FIFTY-TWO**  
**(16794 E. Asbury Ave., Aurora)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about November 19, 2006 through January 22, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to Countrywide Home Loans, with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive , Countrywide Home Loans permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT FIFTY-THREE**  
**(16794 E. Asbury Ave., Aurora)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)**

On or about November 19, 2006 through January 22, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Pablo Sarabia-Martinez, Ricardo Sarabia-Salcido, Pedro Sarabia-Martinez and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT FIFTY-FOUR**  
**(16794 E. Asbury Ave., Aurora)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about November 19, 2006 through January 22, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido, Pablo Sarabia-Martinez and Pedro Sarabia-Martinez** with the intent to defraud Guaranteed Rate and/or Countrywide Home Loans, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to a Loan Application, and a Power of Attorney; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Fifty-Two through Fifty-Four were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

Beginning on or about November 19, 2006 the Worldwide centered Enterprise, consisting of Pedro Sarabia-Martinez and Lauren Maes Sarabia, initially enlisted Rey Martinez to serve as a straw buyer so that they (Worldwide and its key individual players) could take possession of this property for an eventual second sale to another straw buyer, Augustin Herrera, so that a fraudulent loan from Countrywide Home Loans could be used to financially benefit the Enterprise. This transaction started with Pedro Sarabia serving as loan officer and falsely signing off that Mr. Martinez was qualified to receive a loan to buy 16794 E. Asbury Ave. in Aurora, CO. Guaranteed Rate, Inc. was the deceived lender for the first transaction. Contemporaneous to this occurrence Lauren Maes Sarabia entered into a Contract to Buy and Sell Real Estate with Mr. Martinez for the E. Asbury residence. The sales price for this December 29, 2006 transaction was for \$130,000.00. Evidence was developed showing that at the time of the first closing that involved Mr. Martinez as the straw buyer Lauren Maes Sarabia withdrew funds in excess of \$4,899.00 from a Worldwide account which was designed to falsely serve as the down payment that Mr. Martinez was supposed to have brought as part of the sale. Mr. Martinez denies that he contributed any funds to this closing. In addition, Lauren Maes Sarabia received real estate commissions in excess of \$3,000.00 for this purchase that occurred through the use of deceptive tactics, actions and/or statements.

Once the Enterprise had control of the E. Asbury Ave. property as of December 29, 2006, the Enterprise then shifted towards re-enlisting Augustin Herrera to serve as the follow-on straw buyer who was being portrayed by the Enterprise to a lender,

Countrywide Home Loans, as a viable and approved buyer of the E. Asbury property from Mr. Martinez. As was observed in other transactions, Pablo Sarabia-Martinez served as a loan correspondent and qualified Mr. Herrera and Lauren Maes Sarabia served as the real estate agent who entered into a contract with Augustin Herrera for him to purchase this property. Then, on or about January 22, 2007, a closing occurred with Martinez selling the E. Asbury Ave. property to the straw buyer, Mr. Herrera, for \$195,000.00 after a loan had been deceptively obtained from Countrywide Home Loans. Augustin Herrera's loan application that was prepared and submitted by the Enterprise was deceptive and intentionally incorrect, especially regarding there being no reference to other properties, such as 1245 Granby, that Mr. Herrera had just purchased on January 9, 2007 as well as the Tucson property. Ricardo Sarabia-Salcido was again using the Luis Torres notary commission to complete and utter various legal documents that were related to this second closing.

Once Countrywide Home Loans was deceived into funding this loan, Worldwide, primarily through the actions of and accounts controlled by Teresa Martinez, received in excess of \$61,000.00 in ill gotten funds from this straw sale plus Mr. Martinez received a check for \$1,500.00 from this deal that also incorporates a deal for 16794 E. Asbury Ave in Aurora. It should be noted that Mr. Martinez submitted a private payoff letter authorizing the profits from this sale to be diverted to Teresa Martinez. In addition Worldwide Mortgage received a commission and fees in excess of \$1,000.00 for brokering this fraudulent loan. On or about July 29, 2008, this property was foreclosed.

**PREDICATE ACT FIFTY-FIVE**  
**(1402 Leroy Dr., Northglenn)**

THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)

On or about August 25, 2006 through September 18, 2006, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido, Pedro Sarabia-Martinez and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to FMF Capital, with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive , FMF Capital permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT FIFTY-SIX**  
**(1402 Leroy Dr., Northglenn)**

CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)

On or about August 25, 2006 through September 18, 2006, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Pedro Sarabia-Martinez, Ricardo Sarabia-Salcido, and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.

**PREDICATE ACT FIFTY-SEVEN**  
**(1402 Leroy Dr., Northglenn)**

FORGERY, C.R.S. § 18-5-102(1)(c) (F5)

On or about August 25, 2006 through September 18, 2006, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud FMF Captial, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to Loan Applications, a Limited Power of Attorney, a Deed of Trust, a Warranty Deed, an Occupancy and Financial Status Affidavit and a Bill of Sale; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Fifty-Five through Fifty-Seven were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

On or about August 25, 2006 Teresa Martinez bought 1402 Leroy Drive, Northglenn, CO from Wells Fargo Bank for \$135,000.00 with funding provided by People's Choice Home Loans. Inc.. Of note, it was learned that prior to this purchase a structural inspection of this property (based on its legal description) showed that a consulting engineer determined that the second story addition required removal and replacement.

Then on or about September 6, 2006 and again on September 18, 2006, Ricardo Sarabia, on behalf of the alleged Enterprise, served as a loan originator by completing and submitting two loan applications for Alberto and Dina Hernandez to purchase 1402 Leroy Drive, both which contained material misinformation that were designed to deceive the lender, FMF Capital. Contemporaneous to these problematic loan applications, Pedro Sarabia-Martinez, also serving as a loan officer, was listed on an FMF Funding Instruction as being the broker for Alberto and Dina Hernandez, who were supposedly buying 1402 Leroy Drive for \$205,000.00, less than 3 weeks after Teresa Martinez had purchased this structurally compromised property for \$135,000.00.

Lauren Sarabia's role with this transaction included her ordering title from the Enterprise's preferred closing agent, Lauren Jaramillo at United Title Company. Then on September 18, 2006 a closing occurred with Alberto and Dina Hernandez buying the property, after FMF had funded a loan with a principal amount of \$164,000.00. For its efforts Worldwide Mortgage received fees and commissions in excess of \$5,900.00, while Teresa Martinez along with Jose Ricardo Sarabia-Martinez and the family business received profits in excess of \$50,000.00. As part of the closing Ricardo Sarabia, using his alias of Luis A. Torres, fraudulently notarized various legal documents, including but not limited to a Bill of Sale, Escrow Instructions, a Limited Power of Attorney, a Warranty Deed, a Deed of Trust, and an Occupancy and Financial Status Affidavit.

On or about February 10, 2009 , with none of the original principal amount having been paid and thus serving as evidence of debt, this property was foreclosed by the new owner of the debt obligation, US Bank.

**PREDICATE ACT FIFTY-EIGHT**  
**(19106 E. 22<sup>nd</sup> Dr., Aurora)**

**THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about July 24, 2006 through October 11, 2006, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido, and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to Axiom Financial Services, with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive Axiom Financial Services permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**PREDICATE ACT FIFTY-NINE**  
**(19106 E. 22<sup>nd</sup> Dr., Aurora)**

**CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)**

On or about July 24, 2006 through October 11, 2006, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido, and Teresa Martinez** with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.



**PREDICATE ACT SIXTY**  
**(19106 E. 22<sup>nd</sup> Dr., Aurora)**

**FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about July 24, 2006 through October 11, 2006, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud Axiom Financial Services, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to Loan Applications, a Limited Power of Attorney, a Deed of Trust, a Warranty Deed, and a Bill of Sale; in violation of section 18-5-102(1)(c), C.R.S.

The offenses alleged in Predicate Acts Fifty-Eight through Sixty were committed in the following manner and serve as the essential facts along with the incorporation of the essential facts that were described above:

On or about July 24, 2006 Teresa Martinez bought 19106 E. 22<sup>nd</sup> Drive in Aurora, CO from Wells Fargo Bank for \$135,000.00. Then, on or about September 6, 2006 or October 11, 2006, Ricardo Sarabia-Salcido (signing as Ricardo Salcida), on behalf of the alleged Enterprise, served as a loan originator by completing and submitting a loan applications for Alberto and Dina Hernandez to purchase 19106 E. 22<sup>nd</sup>, which contained material misinformation that was designed to deceive the lender, Axiom Financial Services.

Lauren Sarabia's role with this transaction included her serving as the listing agent and ordering title from the Enterprise's preferred closing agent, Lauren Jaramillo at United Title Company. Then on October 11, 2006 a closing occurred with Alberto and Dina Hernandez buying the property, after Axiom had funded two loans, one for \$148,000.00 and a second for \$37,000.00. For its efforts Worldwide Mortgage received fees and commissions in excess of \$5,000.00, while Teresa Martinez along with Jose Ricardo Sarabia-Martinez and the family business received proceeds in excess of \$39,000.00. As part of the closing Ricardo Sarabia-Salcido, using his alias of Luis A. Torres, fraudulently notarized various legal documents, including but not limited to a Bill of Sale, a Limited Power of Attorney, a Warranty Deed, and a Deed of Trust.

Beginning on or about August 6, 2009, with only \$32.14 of the original principal amount having been paid and thus serving as evidence of debt, this property was short sold.

**COUNT THREE**  
**(Statement of Personal History)**

**1001C**        **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about July 12, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez**, with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Statement of Personal History; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT FOUR**  
**(Personal Financial Statement)**

**1001C**        **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about October 11, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez**, with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Personal Financial Statement; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT FIVE**  
**(Verification of Loan x 3)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about November 24-29, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Verification of Loan re. Location3 Media Inc./Andrew Beckman and Paul Gatchis Loans; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT SIX**  
**(Statement of Personal History)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about December 6, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Statement of Personal History; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT SEVEN**  
**(Borrower's Certification)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about December 15, 2010, in the State of Colorado, **Jose Ricardo Sarabia-Martinez**, with the intent to defraud the Small Business Administration and/or Borrego Springs Bank, N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Borrower's Certification; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT EIGHT**  
**(Re. 403 16<sup>th</sup> Street, Suites 200 and 300, Denver, CO)**

**0801V**      **THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(a),(2)(d) (F3)**

On or about December 15, 2010, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan in the form of money belonging to the Small Business Administration and/or Borrego Springs Bank, N.A., with the value of twenty thousand dollars or more, without authorization or by deception, and intended to deprive the Small Business Administration and/or Borrego Springs Bank, N.A., permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(d), C.R.S.

**COUNT NINE**  
**(Re. 403 16<sup>th</sup> Street, Suites 200 and 300, Denver, CO)**

**0801V**      **THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about December 15, 2010, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan in the form of money belonging to Borrego Springs Bank, N.A. and/or the Small Business Administration, with the value of twenty thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to permanently deprive Borrego Springs Bank, N.A. and/or the Small Business Administration of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

The essential facts for the offenses alleged in Counts Three through Nine were previously described in the factual summary in support of Predicate Acts One through Eight for Counts One, Two and Thirty-Seven and is incorporated by reference.

**COUNT TEN**  
**(Rios Driver's License Application)**

**1001D**        **FORGERY, C.R.S. 18-5-102(1)(d) (F5)**

On or about May 21, 2003, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** with the intent to defraud the Colorado Department of Revenue - Motor Vehicles, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: a Colorado Driver's License Application, a public record or instrument filed or required by law to be filed or legally fileable in or with a public office or public servant: the Colorado Department of Revenue - Motor Vehicles; in violation of section 18-5-102(1)(d), C.R.S.

**COUNT ELEVEN**  
**(Rios Driver's License)**

**24051**        **ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306**  
**(F4)**

On or about May 21, 2003, and initially discovered on October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez** unlawfully and feloniously attempted to influence M. Michael Cooke, Executive Director of the Colorado Department of Revenue and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

**COUNT TWELVE**  
**(Torres Equilin Driver's License Application)**

**1001D**      FORGERY, C.R.S. 18-5-102(1)(d) (F5)

On or about September 21, 2001 to December 13, 2002, in the State of Colorado, **Ricardo Sarabia-Salcido** with the intent to defraud the Colorado Department of Revenue - Motor Vehicles, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: a Colorado Driver's License Application, a public record or instrument filed or required by law to be filed or legally fileable in or with a public office or public servant: the Colorado Department of Revenue - Motor Vehicles; in violation of section 18-5-102(1)(d), C.R.S.

**COUNT THIRTEEN**  
**(Torres Esquilin Driver's License)**

**24051**      ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 (F4)

On or about September 21, 2001 to December 13, 2002, and initially discovered on October 20, 2011, in the State of Colorado, **Ricardo Sarabia-Salcido** unlawfully and feloniously attempted to influence Fred Fisher, Executive Director of the Colorado Department of Revenue, and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

**COUNT FOURTEEN**  
**(Rios Notary)**

**1001D**      FORGERY, C.R.S. § 18-5-102(1)(d) (F5)

On or about September 4-5, 2003, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia**, with the intent to defraud the Colorado Secretary of State, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a public record or an instrument, namely: Notary Application, filed, required by law to be filed, or legally fileable in or with the Colorado Secretary of State, a public office or public servant; in violation of section 18-5-102(1)(d), C.R.S.

**COUNT FIFTEEN**  
**(Rios Notary)**

**24051**      **ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306**  
**(F4)**

On or about September 4-5, 2003, and initially discovered on October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia** unlawfully and feloniously attempted to influence Donetta Davidson, Colorado Secretary of State, and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

**COUNT SIXTEEN**  
**(Torres Notary)**

**1001D**      **FORGERY, C.R.S. § 18-5-102(1)(d) (F5)**

On or about September 4-5, 2003, in the State of Colorado, **Ricardo Sarabia-Salcido and Lauren Maes Sarabia**, with the intent to defraud the Colorado Secretary of State, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a public record or an instrument, namely: Notary Application, filed, required by law to be filed, or legally fileable in or with the Colorado Secretary of State, a public office or public servant; in violation of section 18-5-102(1)(d), C.R.S.

**COUNT SEVENTEEN**  
**(Torres Notary)**

**24051**      **ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306**  
**(F4)**

On or about September 4-5, 2003, and initially discovered on October 20, 2011, in the State of Colorado, **Ricardo Sarabia-Salcido and Lauren Maes Sarabia** unlawfully and feloniously attempted to influence Donetta Davidson, Colorado Secretary of State, and/or his or her employee agents, all public servants, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

### **COUNT EIGHTEEN**

**1011A**      **CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(e) (F6)**

On or about May 21, 2003 to September 5, 2003, and initially discovered on October 20, 2011, **Jose Ricardo Sarabia-Martinez** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, namely: Efrain Rios, and in such identity or capacity did an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(e), C.R.S.

### **COUNT NINETEEN**

**1011A**      **CRIMINAL IMPERSONATION - GAIN A BENEFIT, C.R.S. 18-5-113(1)(e) (F6)**

On or about September 21, 2001 to September 5, 2003, and initially discovered on October 20, 2011, **Ricardo Sarabia-Salcido** unlawfully, feloniously, and knowingly assumed a false or fictitious identity or capacity, namely: Luis Adrian Torres Esquilin and/or Luis A. Torres, and in such identity or capacity did an act with intent to unlawfully gain a benefit for himself or another or to injure or defraud another; in violation of section 18-5-113(1)(e), C.R.S.

The essential facts for the offenses alleged in Counts Ten through Nineteen were previously described in the factual summary in support of Predicate Acts Nine through Eighteen for Counts One and Two and is incorporated by reference.

### **COUNT TWENTY** **(Leroy and E. 22<sup>nd</sup>)**

**0801E**      **THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)**

On or about September 18, 2006 to October 11, 2006, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Pedro Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: loans and other funds in the form of money belonging to FMF Capital and/or Axiom Financial Services with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.



**COUNT TWENTY-ONE**  
**(Zuni, S. Laredo, Sable, Durham, Wheeling, W. 46<sup>th</sup>,  
E. 18<sup>th</sup>, Tucson, and E. Asbury)**

**0801E**    THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)

On or about January 18, 2007 to June 15, 2007, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez, Pedro Sarabia-Martinez, Pablo Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: loans and other funds in the form of money belonging to BC Bancorp, JP Morgan Chase Bank/Chase Bank, Chase Home Finance, First Franklin Financial Corp., Plaza Home Mortgage, MLB &T Bank, Countrywide Home Loans, US Bank, and/or Alliance Bancorp, with the value of fifteen thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

**COUNT TWENTY-TWO**  
**(E. 1<sup>st</sup> Ave)**

**0801V**    THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) (F3)

On or about January 16, 2008 through February 14, 2008, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia** unlawfully, feloniously and knowingly obtained or exercised control over a thing of value, namely: a loan and other funds in the form of money belonging to JP Morgan Chase Bank and/or Chase Home Finance, with the value of twenty thousand dollars or more, without authorization or by deception, and knowingly used, concealed, or abandoned the thing of value in such manner as to deprive JP Morgan Chase Bank and/or Chase Home Finance, permanently of its use or benefit; in violation of section 18-4-401(1)(b),(2)(d), C.R.S.

### **COUNT TWENTY-THREE**

(Leroy, E. 22<sup>nd</sup>, Zuni, S. Laredo, Sable, Durham, Wheeling, W. 46<sup>th</sup>, E. 18<sup>th</sup>, Tucson, and E. Asbury)

**0801PC** CONSPIRACY TO COMMIT THEFT-\$15,000 OR MORE, C.R.S. § 18-4-401(1)(b),(2)(d) and C.R.S. § 18-2-201 (F4)

On or about July 24, 2006 through June 15, 2007, and initially discovered on or about October 20, 2011, **Jose Ricardo Sarabia-Martinez, Pablo Sarabia-Martinez, Pedro Sarabia-Martinez, Lauren Maes Sarabia, Ricardo Sarabia-Salcido and Teresa Martinez** in the State of Colorado, with the intent to promote or facilitate the commission of the crime of Theft-\$15,000 or More, unlawfully and feloniously agreed with one or more of the above named individuals, as well as a person or persons to the Grand Jury and the Attorney General unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was fifteen thousand dollars or more; in violation of sections 18-4-401(1)(b),(2)(d) and 18-2-201, C.R.S.

### **COUNT TWENTY-FOUR**

(E. 1<sup>st</sup> Ave.)

**0801VC** CONSPIRACY TO COMMIT THEFT-\$20,000 OR MORE, C.R.S. § 18-4-401(1)(b), (2)(d) and C.R.S. § 18-2-201 (F4)

On or about January 16, 2008 through February 14, 2008, and initially discovered on or about October 20, 2011, in the State of Colorado, **Jose Ricardo Sarabia-Martinez and Lauren Maes Sarabia** with the intent to promote or facilitate the commission of the crime of Theft-\$20,000 or More, unlawfully and feloniously agreed with each other, as well as a person or persons to the Grand Jury unknown that one or more of them would engage in conduct which constituted that crime or attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in furtherance of the conspiracy was committed by one or more of the conspirators, and the value of the thing or things of value was twenty thousand dollars or more; in violation of sections 18-4-401(1)(b), (2)(d) and 18-2-201, C.R.S.

**COUNT TWENTY-FIVE**  
**(Zuni)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about November 15, 2006 through April 2, 2007, in the State of Colorado, **Lauren Maes Sarabia and Ricardo Sarabia-Salcido**, with the intent to defraud the BC Bancorp, Chase Bank and/or Chase Home Finance, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, Verification of Deposit, a Warranty Deed, a Deed of Trust, an Affidavit and Indemnity document, a Name Affidavit, a Limited Power of Attorney, a Rate Lock Request, and/or a Rate Option Confirmation; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT TWENTY-SIX**  
**(S. Laredo)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 11, 2007 through March 15, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Plaza Home Mortgage Inc. and/or First Franklin Financial Corp., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Loan Applications, an Occupancy Declaration, a Warranty and Compliance Agreement, a Verification of Deposit, HUD-1 Settlement Statements, a Warranty Deed, a Deed of Trust, an Affidavit and Indemnity document, a Signature Affidavit and AKA Statement, a Correction Agreement and Limited Power of Attorney, a Power of Attorney, a Rate Lock Request, and/or a Rate Option Confirmation; in violation of section 18-5-102(1)(c), C.R.

**COUNT TWENTY-SEVEN**  
**(Sable)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 31, 2007 through March 29, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Countrywide Home Loans, Inc., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, a HUD-1 Settlement Statement, a Bill of Sale, a Warranty Deed, a Deed of Trust, an Affidavit and Indemnity document, an Identity Affidavit, a Limited Power of Attorney, and a Closing Agent/Notary Public Certification; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT TWENTY-EIGHT**  
**(Durham)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 17, 2007 through April 26, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Countrywide Home Loans, Inc., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, a HUD-1 Settlement Statement, a Bill of Sale, a Warranty Deed, a Deed of Trust, an Affidavit of Occupancy, an Affidavit and Indemnity document, an Name Affidavit, a Compliance Agreement, a Power of Attorney, and a Limited Power of Attorney; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT TWENTY-NINE**  
**(E. 1<sup>st</sup>)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 16, 2008 through February 14, 2008, in the State of Colorado, **Lauren Maes Sarabia**, with the intent to defraud the JP Morgan Chase Bank and/or Chase Home Finance, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Loan Application, a HUD-1 Settlement Statement, a Gift Letter, and/or a Request for Verification of Employment, and Paystubs; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT THIRTY**  
**(Wheeling)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 1, 2007 through April 12, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the Alliance Bancorp, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Notarized documents such as an Assignment of Deed of Trust or Mortgage Deed, a Compliance Agreement, Compliance Agreement and Power of Attorney, Document Correction Compliance Agreement, One and the Same Name Affidavit, and a Deed of Trust; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT THIRTY-ONE**  
**(W. 46<sup>th</sup>)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about December 28, 2006 through June 12, 2007, in the State of Colorado, **Pablo Sarabia-Salcido and Pedro Sarabia-Martinez**, with the intent to defraud the Guarenteed Rate, Inc and/or Countrywide Home Loans, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: Uniform Residential Loan Applications; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT THIRTY-TWO**  
**(E. 18<sup>th</sup>)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about January 15, 2007 through June 15, 2007, in the State of Colorado, **Pablo Sarabia-Martinez**, with the intent to defraud the Chase Bank N.A., unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: a Verification of Employment document; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT THIRTY-THREE**  
**(Tucson)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about October 16, 2006 through January 18, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud the First Franklin Financial Corp, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to a Deed of Trust, a Warranty Deed, and a Bill of Sale; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT THIRTY-FOUR**  
**(E. Asbury)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about November 19, 2006 through January 22, 2007, in the State of Colorado, **Ricardo Sarabia-Salcido, Pablo Sarabia-Martinez and Pedro Sarabia-Martinez** with the intent to defraud Guarenteed Rate and/or Countrywide Home Loans, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to a Loan Application, a Power of Attorney, a Deed of Trust, a Warranty Deed, and/or a Bill of Sale; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT THIRTY-FIVE**  
**(Leroy)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about August 25, 2006 through September 18, 2006, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud FMF Captial, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to Loan Applications, a Limited Power of Attorney, a Deed of Trust, a Warranty Deed, an Occupancy and Financial Status Affidavit and a Bill of Sale; in violation of section 18-5-102(1)(c), C.R.S.

**COUNT THIRTY-SIX**  
**(E. 22<sup>nd</sup>)**

**1001C**      **FORGERY, C.R.S. § 18-5-102(1)(c) (F5)**

On or about July 24, 2006 through October 11, 2006, in the State of Colorado, **Ricardo Sarabia-Salcido**, with the intent to defraud Axiom Financial Services, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which purported to be, or which was calculated to become or to represent if completed, a deed, will, codicil, contract, assignment, commercial instrument, promissory note, or other instrument which document did or may have evidenced, created, transferred, terminated, or otherwise affected a legal right, interest, obligation, or status, namely: various notarized legal documents, including, but not limited to Loan Applications, a Limited Power of Attorney, a Deed of Trust, a Warranty Deed, an Occupancy and Financial Status Affidavit and a Bill of Sale; in violation of section 18-5-102(1)(c), C.R.S.

The essential facts for the offenses alleged in Counts Twenty through Thirty-Six were previously described in the factual summaries in support of Predicate Acts Nineteen through Sixty for Counts One, Two and Thirty-Seven and are incorporated by reference.



**COUNT THIRTY-SEVEN**

**37285 VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL  
ACT- CONSPIRACY, C.R.S. §18-17-104(4) (F2)**

On or about January 1, 2006 through April 15, 2012, and initially discovered on or about October 20, 2011, in the State of Colorado, **Pedro Sarabia-Martinez and Pablo Sarabia-Martinez Martinez** and/or others to the Grand Jury and the Attorney General known or unknown, did unlawfully, knowingly, and feloniously conspire to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of sections 18-17-104(4) and 18-17-104(3), C.R.S.

The essential facts for the offense alleged in Count Thirty-Seven were previously described in the factual summaries that were previously articulated in this Indictment and are incorporated by reference.

JOHN W. SUTHERS  
Attorney General

---

ROBERT SHAPIRO, 26869  
First Assistant Attorney General  
Special Prosecutions Unit  
Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado, this  
\_\_\_\_ day of September, 2014.

---

Notary Public

My commission expires:\_\_\_\_\_

The 2014-2015 Colorado Statewide Grand Jury presents the Indictment contained within and the same is hereby ORDERED FILED this \_\_\_\_\_ day of September, 2014.

Pursuant to § 13-73-107, C.R.S., the Court designates \_\_\_\_\_ County, Colorado as the county of venue for the purposes of trial.

Arrest Warrants are Issued for:

**Jose Ricardo Sarabia-Martinez**, with a bond set at \$ \_\_\_\_\_, with the following conditions: \_\_\_\_\_

**Lauren Maes Sarabia**, with a bond set at \$ \_\_\_\_\_, with the following conditions: \_\_\_\_\_

**Pedro Sarabia-Martinez**, with a bond set at \$ \_\_\_\_\_, with the following conditions: \_\_\_\_\_

**Pablo Sarabia-Martinez**, with a bond set at \$ \_\_\_\_\_, with the following conditions: \_\_\_\_\_

**Ricardo Sarabia-Salcido**, with a bond set at \$ \_\_\_\_\_, with the following conditions: \_\_\_\_\_

**Teresa Martinez**, with a bond set at \$ \_\_\_\_\_, with the following conditions: \_\_\_\_\_

\_\_\_\_\_  
Chief District Court Judge,  
Second Judicial District,  
State of Colorado

